

EXHIBIT C

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

**REPORTER'S CERTIFIED
TRANSCRIPT**

TESLA, INC., a Delaware)
corporation,)
Plaintiff,) Case No.:
v.) 3:18-cv-00296 LRH-CBC
MARTIN TRIPP,)
Defendant,)
AND RELATED COUNTER-CLAIMS.)

CONFIDENTIAL

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VIDEOTAPE DEPOSITION OF MARTIN TRIPP

PHOENIX, ARIZONA
WEDNESDAY, SEPTEMBER 4, 2019
9:01 A.M.

DAVID M. LEE, RMR, CCR
Certified Reporter
Certificate Number 50391
File No.: 19-29468



09:02 1 witness.

09:02 2 THE CERTIFIED REPORTER: Sir, would you

09:02 3 raise your right hand, please.

09:02 4 You solemnly swear the testimony you're

09:02 5 about to give in the matter now pending shall be the

09:02 6 truth, the whole truth, and nothing but the truth

09:02 7 so help you God?

09:02 8 THE WITNESS: I do.

09:02 9 THE CERTIFIED REPORTER: Thank you.

09:02 10 MR. FISCHBACH: Sean, before we get

09:02 11 started, just a minor housekeeping note.

09:02 12 Mr. Tripp has a -- a -- has a back

09:02 13 injury, so just please understand we might need to

09:02 14 break from time to time for him to stand up and

09:02 15 walk around and things like that, so...

09:02 16 MR. GATES: Sure, that's no problem.

09:02 17

09:02 18 MARTIN TRIPP,

09:02 19 called as a witness herein, first duly sworn by the

09:02 20 reporter, was examined and testified as follows:

09:02 21

09:02 22 EXAMINATION

09:02 23 BY MR. GATES:

09:02 24 Q. Along those lines, Mr. Tripp, are you

09:02 25 taking any medications that would prevent you from

09:48	1	Q. Which year?
09:48	2	A. 2015.
09:48	3	Q. So you were married in 2015.
09:48	4	A. Yes, so four years.
09:48	5	Q. When you were sharing information with
09:48	6	Linette Lopez, information that you had obtained
09:48	7	from Tesla, did -- did your wife know about that?
09:48	8	A. She did not.
09:48	9	Q. Did you tell her that "I might lose my
09:49	10	job"?
09:49	11	MR. FISCHBACH: I'm going to object on the
09:49	12	basis of marital privilege and instruct the witness
09:49	13	not to answer.
09:49	14	MR. GATES: And we're going to play this
09:49	15	little game probably throughout, which is he
09:49	16	instructs you not to answer. I ask you "Are you
09:49	17	going to follow your attorney's instruction?" So
09:49	18	you have to decide whether or not to follow his
09:49	19	instruction.
09:49	20	Q. So I'm going to ask you are you going to
09:49	21	follow your attorney's instruction?
09:49	22	A. Yes, I am.
09:49	23	Q. When you were sharing information with
09:49	24	Linette Lopez, information that you had taken from
09:49	25	Tesla, how did you think it was all going to end?

09:49	1	What did you think was going to be accomplished?
09:49	2	A. I was hoping that it would cause Tesla to
09:49	3	change its ways and improve things. That's what I
09:50	4	was hoping for.
09:50	5	Q. Did you think that even if Tesla changed its
09:50	6	ways, it might have been upset that somebody had
09:50	7	taken its information and shared it with a reporter?
09:50	8	MR. FISCHBACH: Objection; foundation.
09:50	9	Answer if you can.
09:50	10	THE WITNESS: That was a possibility, but
09:50	11	based on the issues that I saw, I was more concerned
09:50	12	to get the information out than the repercussions
09:50	13	from that.
09:50	14	Q. BY MR. GATES: Did you think in the end you
09:50	15	were going to be seen as a hero?
09:50	16	A. I did not think of it that way at all.
09:50	17	Q. You didn't.
09:50	18	What did you think was going to happen
09:50	19	with your job?
09:50	20	A. I didn't think that far ahead; I was not
09:50	21	worried. I was more concerned about public safety.
09:51	22	Q. Do you think you should be viewed as a hero
09:51	23	for disclosing Tesla's confidential information to
09:51	24	a reporter?
09:51	25	A. No.

09:51 1 Q. How should you be viewed then?

09:51 2 A. Preferably not viewed at all.

09:51 3 Q. All right. You wanted to remain anonymous.

09:51 4 A. That is correct.

09:51 5 Q. You wanted to continue with your job at

09:51 6 Tesla while continuing to provide information to

09:51 7 reporters.

09:51 8 A. Only if it was necessary.

09:51 9 Q. And you were going to do that for as long

09:51 10 as you thought it was necessary.

09:51 11 A. Yes.

09:51 12 Q. As determined by you.

09:51 13 A. Yes.

09:51 14 Q. So you thought by changing -- by -- excuse

09:51 15 me. Let me start that again.

09:51 16 You thought by sharing information with

09:51 17 Linette Lopez, you would change the -- what was

09:52 18 being done at the Tesla Gigafactory; right?

09:52 19 A. That was my hope.

09:52 20 Q. And you were going to continue to provide

09:52 21 information from Tesla to Linette Lopez as long as

09:52 22 it was -- you thought there were things that needed

09:52 23 to be changed at Tesla's Gigafactory.

09:52 24 A. If it involved public safety, yes.

09:52 25 Q. So a lot of the information that you

17:53 1 A. It tells me that it made it out of the
17:53 2 Gigafactory.

17:53 3 Q. Okay. Does it tell you one way or another
17:53 4 whether anything made it into a VIN?

17:53 5 A. Not in this instance, it is not.

17:53 6 MR. GATES: Okay. No further questions.

17:53 7 MR. FISCHBACH: Read and sign.

17:53 8 VIDEO TECHNICIAN: This is the conclusion
17:53 9 of the --

17:53 10 MR. GATES: Hold on; I've got to designate
17:53 11 it as confidential.

17:53 12 Designate the transcript a
17:54 13 confidential.

17:54 14 VIDEO TECHNICIAN: All right. This is the
17:54 15 conclusion of the deposition of Martin Tripp; the
17:54 16 time is approximately 5:53. We're going off the
17:54 17 record; end of media file number five.

18 MR. GATES: All right. Thank you.

19 (The deposition concluded at 5:53 p.m.)

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